

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
MARSHALL DIVISION**

TQ DELTA, LLC,

*Plaintiff,*

v.

COMMSCOPE HOLDING COMPANY,  
INC., COMMSCOPE, INC., ARRIS US  
HOLDINGS, INC., ARRIS SOLUTIONS,  
INC., ARRIS TECHNOLOGY, INC., and  
ARRIS ENTERPRISES, LLC,

*Defendants.*

Civil Action No.: 2:21-cv-00310-JRG

**DECLARATION OF ANDREW S. ONG IN SUPPORT OF COMMSCOPE'S  
OPPOSITION TO PLAINTIFF TQ DELTA'S MOTION FOR SUMMARY JUDGMENT  
REGARDING BREACH OF FRAND OBLIGATIONS (Dkt. 335)**

I, Andrew S. Ong, declare:

1. I am a partner at Goodwin Procter LLP, counsel of record for Defendants CommScope Holding Company, Inc., CommScope Inc., ARRIS US Holdings, Inc., ARRIS Solutions, Inc., ARRIS Technology (collectively, "CommScope"). I am over the age of 18 years, have personal knowledge of the matters in this declaration, and if called as a witness, I would and could competently testify to them.

2. Attached hereto as **Exhibit F** is a true and correct copy of excerpts from the Corrected Expert Report of Jonathan D. Putnam, dated September 3, 2022.

3. Attached hereto as **Exhibit G** is a true and correct copy of excerpts from the Opening Expert Report of Todor Cooklev, Ph.D, dated August 29, 2022.

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I declare under penalty of perjury that the foregoing is true and correct. Executed on January 6, 2022, in San Francisco, California.

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*/s/ Andrew S. Ong*  
Andrew S. Ong